



GOMBOS | LEYTON PC

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Ex. 20

February 11, 2020

Via Email: info@moe.gov.krd

Dr. Alan Hama Saeed Salih
Minister of Higher Education
Ministry of Higher Education and Scientific Research
Kurdistan Region Government
60 M Street
Erbil, Kurdistan Region, Iraq

Re: American Stratford University – Erbil Campus

Dear Minister Saeed Salih:

Our law firm represents Stratford University (SU) which is located in Falls Church, Virginia, USA. Stratford University's president is Dr. Richard Shurtz. On June 8, 2018, the Ministry approved "American Stratford University" to open and operate a campus in Erbil, subject to "obtaining necessary requirements for opening the mentioned branch". (See Attachment 1, Ministerial Order 1146.) Stratford University (USA) did not pursue the actual opening and operation of a branch campus in Erbil because it did not seek to obtain an approval from its accrediting agency, Accrediting Council of Independent Colleges and Schools (ACICS), to open a campus in Erbil. The quoted reference to obtaining necessary requirements in Order 1146 was intended to address the matter of pre-approval by ACICS.

SU sought the approval from the Ministry because it was SU's understanding that this was a requirement of the Ministry and it was Stratford University's plan to engage in a joint venture with Dr. Saqi Barzani and International Academic City (IAC), and perhaps others to establish a branch campus. As a preliminary step, SU and Dr. Barzani entered into a Memorandum of Understanding (MOU). (See Attachment 2, MOU.)

Dr. Barzani, through IAC, and SU did not, however, enter into the envisioned joint venture. In fact, on December 27, 2019, the relationship was officially severed. Until that time, Stratford Language Institute (SLI), a division of SU, operated with Dr. Barzani as the designated operator in Erbil.

SLI is accredited by a different agency, the Commission on English Language Program Accreditation (CEA). SLI offered English as a Second Language and other non-degree foundation courses in Erbil. SU did not offer any programs in Erbil or Kurdistan and did not authorize IAC or Dr. Barzani to offer SU programs or to use its name.

The severance of the relationship occurred following the issuance by ACICS of an order to show cause why SU's accreditation should not be withdrawn because of an alleged operation of an unapproved branch location of SU in Erbil. (See Attachment 3, show cause directive, pages 1-3.) The problem SU has with its accreditor, ACICS, stems from the unauthorized actions and conduct of Dr. Barzani and IAC who controlled the advertising, marketing and representations to students and prospective students about American Stratford University and Kurdistan. In fact, SU is highly concerned that Dr. Barzani is continuing to misrepresent to prospective and actual students that SU is operating a branch in Erbil, notwithstanding the severance of the relationship on December 27, 2019, notice from our firm to Dr. Barzani's US based attorney on January 14, 2020 and disclosures on SU's website and in social media.

Because of Dr. Barzani's actions and conduct; because of the severance of the relationship between Dr. Shurtz and Dr. Barzani; and because of the false and inaccurate impression that the Ministry's license of American Stratford University may give to the public that SU operates a campus in Erbil, we ask that you immediately:

1. Hereby accept SU's relinquishment of the license, Ministerial Order 1146, issued June 8, 2018 to American Stratford University;
2. Immediately withdraw the license and remove the name "American Stratford University – Erbil Campus" from your website of licensed institutions;
3. Take such action as is appropriate and within your authority to ensure that Dr. Barzani and IAC immediately cease and desist from acting in any way as to suggest that students may enroll in SU programs in Erbil;
4. Notify Dr. Barzani that he may not represent, suggest or imply that Stratford University or Stratford Language Institute are institutions of higher education authorized to do business or operate in the Kurdistan Region;
5. Prohibit Dr. Barzani from using the name, logos and seals of Stratford University and Stratford Language Institute, two trademarked entities (see Attachment 4, evidence of trademark); and
6. Accept SU's offer to provide the Ministry with \$22,255 sent to Dr. Shurtz by Dr. Barzani. This money may have been sent under the terms of the MOU though it arrived without any explanation on December 17, 2019. In the meantime, ACICS ordered SU in the Show Cause Order (Attachment 3) to refund any monies received in Erbil to the students. SU does not know who the students are and does not know who to possibly refund money to and therefore has not been able to refund any money. SU does not know if IAC or Dr. Barzani refunded any



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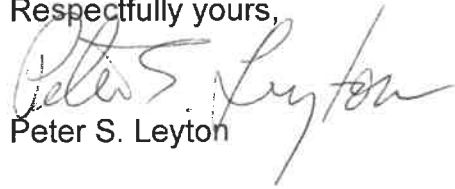
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money. However, in Dr. Barzani's and IAC's letter to ACICS of December 27, 2019, they state that they own the Erbil Campus and that ACICS has no right to "dictate" withdrawal of or refunds to students. (See Attachment 5). The \$22,255 is the only money SU received from Dr. Barzani or IAC. SU asks the Ministry to accept and refund this money, if possible, or accept the money as a gift to use as scholarship money for needy students in Erbil.

Please let us know how we should proceed with respect to these funds which are presently in an escrow account.

If you have any questions, please contact me.

Respectfully yours,



Peter S. Leyton

cc: Dr. Richard Shurtz (with enclosures)

ACICS (with enclosures)

Attachments

